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7 Attorney for TIMOTHY J. WALKER

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
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11 UNITED STATES OF AMERICA,
12
13 Plaintiff,

14 vs.

15 TIMOTHY J. WALKER,
16 Defendant.

Case No.: 16-CR-042-JAD-PAL

STIPULATION TO MODIFY
CONDITIONS OF RELEASE

17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United
18 States Attorney, and Lisa Cartier-Giroux, Assistant United States Attorney, counsel for the United
19 States of America, and Rene Valladares, Federal Public Defender, and WILLIAM CARRICO, Assistant
20 Federal Public Defender, counsel for TIMOTHY J. WALKER, that this Court amend the conditions of
21 Pretrial Release.

22 This Stipulation is entered into for the following reasons:

23 1) On February 11, 2016, the Defendant, Timothy Jason Walker appeared before the
24 Court (Leen, J.), for an initial appearance and bail hearing. He was released on his own recognizance
25 and Pretrial Supervision and several conditions. The Pretrial Officers have visited Mr. Walker's
26 residence, which is the home of his mother and step-father. As a consequence of Pretrial Services visit,
27 certain aspects of Mr. Walker's living situation have been verified. As a consequence, the Parties have
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1 agreed to ask the Court to consider amending certain conditions of Mr. Walker's conditions to reflect
2 the situation as it is now known.

3 2) In order to comply with the condition that he seek and maintain employment, it is
4 believed that potential employers may require that he use a work computer to apply for a position, and
5 clock into and out of, his place of employment. Therefore the Parties jointly request that *Condition #54*
6 *be modified by lining out the words "place of employment," and that Conditions #55 be added*, which
7 would amend from requiring a total prohibition, to instead instruct that the "defendant may only use
8 authorized computer systems at his place of employment for employment purposes."

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10 3) *Furthermore, after* having verified that all devices and desktop computers within the
11 residence are password protected, the Parties ask that the Court *modify Condition #74*, which would
12 require "all wifi and internet access" to be terminated within 48 hours, *read instead that all internet and*
13 *WiFi access must remain password protected, and the Defendant is not to have access to the password*
14 *or the systems.*

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16 DATED March 2, 2016.

17 RENE L. VALLADARES
18 Federal Public Defender

DANIEL BOGDEN
United States Attorney

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20 By: /s/ William Carrico
21 WILLIAM CARRICO
Asst. Federal Public Defender

By: /s/ Cristina Silva for
LISA CARTIER-GIROUX
Assistant United States Attorney

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4 UNITED STATES DISTRICT COURT

5 DISTRICT OF NEVADA

6 * * *

7 UNITED STATES OF AMERICA,

Case No.: 16-CR-042-JAD-PAL

8 Plaintiff,

ORDER

9 vs.

10 TIMOTHY J. WALKER,,
11

12 Defendant.
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15 IT IS HEREBY ORDERED, that this Court amend the conditions as the Parties jointly
16 request that Condition #56 be replaced by #55, which would amend from requiring a total prohibition,
17 to instead instruct that the “defendant may only use authorized computer systems at his place of
18 employment for employment purposes and remove Condition number 74, which would require “all wifi
19 and internet access” to be terminated within 48 hours.

20 DATED 10th day of March, 2016.
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24 UNITED STATES MAGISTRATE JUDGE
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